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December 12, 2016

By Email:

The Honorable Analisa Torres
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Edwards v. Hearst Communications, Inc.*, Case No. 15-cv-09279-AT-JLC (S.D.N.Y.)

Request to File Under Seal: (1) Plaintiff's December 12, 2016 Letter, And The Exhibits Attached Thereto

Dear Judge Torres:

I write on behalf of Plaintiff Josephine James Edwards ("Plaintiff") in the above-referenced action. Pursuant to Paragraph 8 of the Confidentiality Agreement and Stipulated Protective Order (the "Protective Order") entered in this action (Doc. No. 42) and Paragraph IV.A of Your Honor's Individual Practices In Civil Cases, Plaintiff respectfully requests leave to file under seal Plaintiff's December 12, 2016 Letter, and the exhibits attached thereto.

Plaintiff's December 12, 2016 Letter cites to the Rule 30(b)(6) deposition transcript of James H. Murphy, the deposition of Plaintiff, and Hearst's Fourth Amended Objections and Responses to Plaintiff's Interrogatories, all of which have been designated as "confidential" pursuant to the Protective Order. The Exhibits attached to Plaintiff's Letter are copies of those confidential documents.

Pursuant to Paragraph IV.A of Your Honor's Individual Practices In Civil Cases, I have attached: (1) one full set of the relevant document(s) in highlighted form and (2) one partial, looseleaf set of solely those pages on which Plaintiff seeks to redact material.

Very truly yours,



Joseph I. Marchese

CC: All counsel of record (via email)